

March 31, 1994

MEMORANDUM

SUBJECT: BLUEWATER URANIUM MINE SITES/ATSDR RECOMMENDATIONS:
Followup with Bill Nelson

FROM: Carolyn Douglas, Navajo Project Officer for Superfund

TO: Navajo Nation Correspondence File

Recommendations proposed to assist local residents

1. *The ATSDR, in coordination with the Navajo Tribal Council, the IHS, the BIA, the State of New Mexico, and other appropriate agencies, will conduct an environmental health education program to advise the public and medical community of the nature and possible consequences of exposure to ionizing radiation and heavy metal contaminants at the N-BV and N-D sites. Health education materials and assistance will be provided to local health care providers and other appropriate local public health officials.*

Response: This has been completed. The project was funded by the ATSDR.

2. *The ATSDR will consider conducting health surveillance activities for populations at these sites.*

Response: This was not done solely and partially due to action taken for #1. ATSDR reviewed local clinics records.

3. *The ATSDR will consider conducting a radiation or heavy metal exposure study of the local residents once additional health-related information on the local residents becomes available.*

Response: ATSDR decided not to do this.

Recommendations for additional actions to protect the public health of area residents.

4. *The responsible environmental regulatory agencies should within the calendar quarter, initiate data collection efforts to begin the*

characterization and determination of the extent of the radioactive contamination and possible presence of heavy metals. This sampling should include public water supplies and private wells in the area. Those wells exceeding standards should not be used for potable water and residents should be supplied with alternate potable water.

Response: This has been done by EPA and the Navajo Nation. The data has been reviewed by the ATSDR.

5. During this phase, personal radiation dosimeters and radon detection devices should be provided by the appropriate agencies to local residents to begin to estimate the external radiation exposure being received.

Response: Some devices were placed in homes. USEPA and ATSDR decided jointly that dosimeters was not appropriate for individuals in this case.

6. During these environmental studies and personal monitoring efforts, if the data being collected indicates that an imminent radiation health hazard exists to the area residents, then immediate steps, including consultation with the ATSDR, should be taken to mitigate that health hazard.

Response: Overall results did not indicate imminent problem except for certain areas that were "removed."

7. The mitigation or remediation would include, as appropriate, dissociation of local residents from the site until the direct public health hazard is removed. The remediation of the public health hazard should occur in the most expeditious manner consistent with Federal and State environmental protection, health, and radiation protection laws and regulations. Appropriate steps should be taken to protect public health during any removal actions (e.g., dust control, site access restrictions, and monitoring of radiation levels).

Response: The appropriate steps were completed. USEPA immediately initiated actions to mitigate the problems at the Bluewater sites.

8. If these analyses indicate that the radiation exposures would result in a long term, chronic exposure, then applicable measures should be taken by the appropriate remedial regulatory agencies to remediate the public health hazard in the most expeditious manner and consistent with all applicable Federal, Tribal, and State guidelines and recommendations.

Response: Bill Nelson's impression is that as a result of the removal action, very small long-term exposures remain but some review may be needed.

9. The appropriate agency should sample biota, food crops, and livestock to ascertain the potential for internal radiation exposure through consumption of contaminated food products and to identify additional sources of external exposure.

Response: Some biota and food stuffs were samples. It is believed not to be a problem.

10. The appropriate responsible agency should take steps to prevent access to or otherwise make physically safe the various open mine areas, pits, and shafts.

Response: This was completed by USEPA Region 9.

11. Governmental agencies and any involved private sector organizations should work closely with Navajo representatives to ensure that cultural awareness and respect are observed and practiced.

Response: This has been done and is still happening.